



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

SR- 6J

December 12, 2019

Mr. Scott Keesling
Georgia-Pacific LLC
133 Peachtree Street NE
Atlanta, Georgia 30303

RE: Area 1: Pre-Design Investigation Work Plan, Addendum 7 Approval

Dear Mr. Keesling:

The U.S. Environmental Protection Agency (EPA) has completed its review of the Area 1 Pre-Design Investigation Work Plan (PDIWP) Addendum 7, submitted on October 15, 2019, by Georgia-Pacific LLC (GP) and International Paper Company (IP) for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site. The PDIWP Addendum 7 describes the additional sampling required to delineate sediment hot spots within the 3-mile stretch of Area 1 of the Kalamazoo River referred to as the Remedial Reach.

Although, EPA concurs with the sampling approach, since fall field work was postponed until spring due to inclement weather, EPA recommends submitting all samples from Analytical Groups 1 and 2 simultaneously for analysis, as the sampling described in Addendum 7 is necessary to complete the 95% design within the Remedial Reach. Although there is a possibility that further sampling may be required, EPA believes the data collected from the Addendum 7 sampling should be enough to complete the design. GP and IP should take all steps necessary to expedite completion of the sampling within the Remedial Reach and complete the remedial design by June 2020.

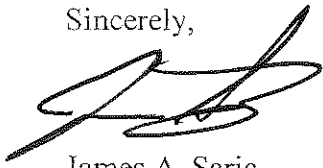
Given the delays associated with hot spot delineation, EPA recommends that GP and IP consider completing the design for the Crown Vantage side channel and initiating remediation during the summer of 2020.

Finally, the document discusses a goal of obtaining a 1 mg/kg post-remedial Surface-Weighted Average Concentration (SWAC). This SWAC goal is inconsistent with the remedial goals and objectives for Area 1. The goal should be to achieve a SWAC of 0.33 mg/kg to minimize the reliance on natural recovery processes.

Therefore, EPA approves the Area 1 PDIWP Addendum 7. GP and IP should make all efforts to expedite completion of the design within the Remedial Reach and initiate remedial action.

Please contact me at (312) 886-0992 if you have any questions regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Saric', with a stylized flourish at the end.

James A. Saric
Remedial Project Manager
SEMD Remedial Response Branch #1

cc: Dan Peabody, EGLE
Brian Jones, IP